

EXHIBIT A

Cheng Declaration

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: TALEN ENERGY CORPORATION, Reorganized Debtor.¹	§ § § § § § § § §	Chapter 11 Case No. 22-90339 (MI)
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**DECLARATION OF EARNESTIENA CHENG IN SUPPORT OF
GUC TRUSTEE'S TWELFTH OMNIBUS OBJECTION TO CERTAIN CLAIMS**
(Duplicate and Wrong Debtor Claims)

I, Earnestiena Cheng, hereby declare:

1. I am a Senior Director with FTI Consulting, Inc. (“FTI”), the financial advisor to the GUC Trust. I am generally knowledgeable about and familiar with the Debtors’ and Reorganized Debtors’ businesses and financial affairs.

2. Except as otherwise indicated, the facts set forth in this declaration (this “Declaration”) are based upon my personal knowledge, work performed by others on the FTI team in consultation with counsel, my discussions with employees of the Reorganized Debtors and/or their other advisors, and based upon my general experience and knowledge related to the Debtors’ and Reorganized Debtors’ liabilities and information from its books and records, as well as the Claims Register. If called upon to testify, I would testify competently to the facts set forth herein. I am authorized to submit this Declaration on behalf of the GUC Trust. I am familiar with

¹ The last four digits of the Reorganized Debtor’s federal tax identification number are 7305, and the Debtors’ primary mailing address is 2929 Allen Parkway, Suite 2200, Houston, TX 77019. The chapter 11 cases of the affiliates of the Reorganized Debtor were closed effective as of July 28, 2023, and a complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ Claims and Noticing Agent at <https://cases.ra.kroll.com/talenenergy>.

the *GUC Trustee's Twelfth Omnibus Objection to Certain Claims (Duplicate and Wrong Debtor Claims)* (the "Objection"), filed concurrently herewith and incorporated herein by reference.²

3. To the best of my knowledge, information, and belief, the assertions made in the Objection are accurate. I reviewed the Objection, and can confirm that FTI in evaluating the Duplicate and Wrong Debtor Claims, has reviewed information from the Reorganized Debtors' books and records, information from the Reorganized Debtors' financial advisors, information from the relevant proofs of claim and Claims Register, the supporting documentation, and other information available to it, and has determined that each Duplicate and Wrong Debtor Claim listed on Schedule 1 to the Proposed Order in the column entitled "Claim to be Disallowed" was filed against the wrong Debtor and is a duplicate of or subsumed within the claim listed in the column entitled "Surviving Claim."

4. Failure to disallow the Duplicate and Wrong Debtor Claims could result in the applicable claimants receiving unwarranted and duplicate recoveries to the detriment of the GUC Trust Beneficiaries.

5. Moreover, disallowance of these claims will enable the Claims Agent to maintain a claims register that more accurately reflects the claims that exist against the Debtors. As such, I believe that disallowance of the Duplicate and Wrong Debtor Claims is appropriate.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the facts set forth in the foregoing Declaration are true and correct to the best of my knowledge, information, and belief.

Dated: December 14, 2023

/s/ Earnestiena Cheng

Earnestiena Cheng
Senior Director
FTI Consulting, Inc.

² Capitalized terms used but not defined in this Declaration shall have the meanings ascribed to them in the Objection.